



including proposed intervenors, in this action, including any parent corporation and any publicly held corporation that owns 10% or more of the stock of a party or proposed intervenor:

- **Plaintiff Chris Pinder, individually;**
- **Plaintiff Chris Pinder, as prospective executor of the Estate of April Pinder, deceased;**
- **Defendant Lancer Insurance Company;**
- **Defendant Tristan Logistics, LLC;**
- **Defendant Carlton O. Douglas;**
- **Defendant Magellan Transport, Inc.;**
- **Defendant Magellan Transport Logistics, Inc.;**
- **Defendant Henkel Global Supply Chain B.V., Inc.; and**
- **Defendant Walmart, a Delaware limited partnership of which WSE Management, LLC, is the general partner, and WSE Investment, LLC, is the limited partner. The sole member of both WSE Management, LLC, and WSE Investment, LLC, is Wal-Mart Stores East, LLC, an Arkansas limited liability company whose sole member is Walmart Inc. Walmart Inc., is a Delaware corporation with its principal place of business located in the State of Arkansas.**

2. The undersigned further certifies that the following is a full and complete list of all other persons, associations, firms, partnerships, or corporations having either a financial interest in or other interest which could be substantially affected by the outcome of this case:

- **None.**

3. The undersigned further certifies that the following is a full and complete list of all persons serving as attorneys for the parties, including proposed intervenors, in this case:

- **Briant G. Mildenhall and Joseph A. Fried of Fried Goldberg, LLC, counsel for Plaintiff Chris Pinder.**
- **Michael L. Miller and Jack D. Summer of Drew, Eckl & Farnham, LLP, counsel for Defendant Walmart.**
- **Chandler L. Smith of McMickle, Kurey & Branch, LLP, counsel for Defendant Lancer Insurance Company.**
- **N. Caitlin Eldred and Stephen J. Cohen of Copeland, Stair, Valz & Lovell, LLP, counsel for Defendants Tristan Logistics, LLC and Carlton O. Douglas.**
- **Gillian S. Crawl-Parrish of Swift, Currie, McGhee & Hiers, LLP, counsel for Defendant Henkel Global Supply Chain B.V., Inc.; and**

- **Daniel Floyd of Lewis, Brisbois, Bisgaard & Smith, LLP, counsel for Defendants Magellan Transport, Inc. and Magellan Transport Logistics, Inc.**

4. The undersigned further certifies that the following is a full and complete list of the citizenship of every individual or entity whose citizenship is attributed to a party or proposed intervenor on whose behalf this certificate is filed:

- **Plaintiff Chris Pinder, as sole surviving spouse of April L. Pinder, deceased, and as prospective executor of the Estate of April L. Pinder, deceased, was, at the time of the incident giving rise to this litigation and are now, citizens of the State of Georgia (Am. Compl. ¶¶ 3-4).**
- **Defendant Lancer Insurance Company, was, at the time of the commencement of this action and is at the present time, a Delaware corporation, with its principal place of business in New York. A corporation is deemed to be a citizen of both its state of incorporation and the state in which it maintains its principal place of business. 28 U.S.C. §1332(c)(1). By virtue of being incorporated in and having its principal place of business located in said states, Lancer Insurance Company was, at the time of the commencement of this action and is**

now, citizens of the States of Delaware and New York, and was not then and is not now a citizen of the State of Georgia.

- Defendant Tristan Logistics, LLC, was, at the time of the commencement of this action and is at the present time, a Pennsylvania limited liability corporation, with its principal place of business in Pennsylvania. (Am. Compl. ¶ 6). Tristan Logistics, LLC's, sole member is Carlton O. Douglas. Douglas is a citizen of the Commonwealth of Pennsylvania. Thus, for purposes of diversity jurisdiction, Tristan Logistics, LLC, is considered a citizen of the Commonwealth of Pennsylvania, and was not then and is not now a citizen of the State of Georgia.
- Defendant Carlton O. Douglas, was, at the time of the incident giving rise to this litigation and is now, a citizen of the Commonwealth of Pennsylvania and was not then and is not now a citizen of the State of Georgia. (Am. Compl. ¶ 10).
- Defendant Magellan Transport, Inc., was, at the time of the commencement of this action and is at the present time, a Florida corporation, with its principal place of business in Florida. (Am. Compl. ¶ 11). A corporation is deemed to be a citizen of both its state

- of incorporation and the state in which it maintains its principal place of business. 28 U.S.C. §1332(c)(1). By virtue of being incorporated in and having its principal place of business located in said state, Magellan Transport, Inc., was, at the time of the commencement of this action and is now, a citizen of the State of Florida, and was not then and is not now a citizen of the State of Georgia.
- Defendant Magellan Transport Logistics Inc., was, at the time of the commencement of this action and is at the present time, a Florida corporation, with its principal place of business in Florida. (Am. Compl. ¶ 15). A corporation is deemed to be a citizen of both its state of incorporation and the state in which it maintains its principal place of business. 28 U.S.C. §1332(c)(1). By virtue of being incorporated in and having its principal place of business located in said state, Magellan Transport Logistics Inc., was, at the time of the commencement of this action and is now, a citizen of the State of Florida, and was not then and is not now a citizen of the State of Georgia.
  - Defendant Henkel Global Supply Chain B.V. Inc., was, at the time of the commencement of this action and is at the present time, is a foreign

corporation, incorporated in Netherlands, with its principal place of business in Netherlands. (Am. Compl. ¶ 19). A corporation is deemed to be a citizen of both its state of incorporation and the state in which it maintains its principal place of business. 28 U.S.C. §1332(c)(1). By virtue of being incorporated in and having its principal place of business located in Netherlands, Henkel Global Supply Chain B.V. Inc., was, at the time of the commencement of this action and is now, a citizen of Netherlands, and was not then and is not now a citizen of the State of Georgia.

- Defendant Wal-Mart Stores East, L.P., was, at the time of the commencement of this action and is at the present time, a Delaware limited partnership of which WSE Management, LLC, is the general partner, and WSE Investment, LLC, is the limited partner. (Am. Compl. ¶ 20). The sole member of both WSE Management, LLC, and WSE Investment, LLC, is Wal-Mart Stores East, LLC, an Arkansas limited liability company whose sole member is Walmart, Inc. Walmart, Inc., is a Delaware corporation with its principal place of business located in the State of Arkansas. A corporation is deemed to be a citizen of both its state of incorporation and the state in which it

**maintains its principal place of business. 28 U.S.C. §1332(c)(1). Thus, for purposes of diversity jurisdiction, Wal-Mart Stores East, L.P. is considered a citizen of the States of Delaware and Arkansas, and was not then and is not now a citizen of the State of Georgia.**

Respectfully submitted, this 7<sup>th</sup> day of December, 2022.

**DREW, ECKL & FARNHAM, LLP**

/s/ Michael L. Miller

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I further certify that the foregoing has been prepared with Times New Roman, 14-point font, in compliance with L.R. 5.1(b).

This 7<sup>th</sup> day of December, 2022.

**DREW, ECKL & FARNHAM, LLP**

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